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U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

St. Louis Cardinals LLC
______________________________,
Plaintiff,

v.

Douglas J. Lewis d/b/a STL PRODUCTS
______________________________,
Defendant,

Case #

407CV00473DDN

DEFENDANTS REPLY MEMORANDUM

Mr. Doug Lewis having its principal address at 4143 Fox Crossing St. Louis, Mo 63034
In "further' answering the Notice / Summons filed by Plaintiff, The St. Louis Cardinals LLC,
Defendant says as follows:

From: Mr. Douglas Lewis
4143 Fox Crossings
St. Louis, Mo 63034
314 341-8567

To: Missouri Secretary of States Office
P.O.Box 784
Jefferson city. MO 65102

Date: March 28, 2007

Re: **Cancellation of below listed marks based on "Coercion"** and **"Discrimination".**

Based on "coercion" and "discrimination" from the St. Louis Cardinals Legal Team and its attorneys, who wish to capitalize on Mr. Lewis' legally registered Trademarks/Servicemaks listed below, who wish to obtain registration for themselves (St. Louis Cardinals) either directly or indirectly by use of agents or representatives.

Mr. Lewis Upon information and belief, believes the St. Louis Cardinals and its attorneys, who has in the past disallowed and band Mr. Lewis' products, calling them bootlegged, unauthorized and unofficial, now comes

in a discriminatory effort to monopolize and single out Mr. Lewis' registered products and shut down his small business.

Mr. Lewis is forced to request the below Trademarks / Service marks be cancelled.

It must be noted the Cardinals had not registered or granted the official MLB SEAL to the below listed Trademarks/Servicemarks or "Agents" that they now wish to capitalize on and endorse.

(1) Go Cards St. Louis Baseball,	Registration No. 016927
(2) St. Louis Baseball	Registration No. S16273
(3) Card Ball	Registration No. S15724
(4) Card Ball Bird	Registration No. S15778
(5) Red Bird Design with Baseball Glove	Registration No. S15746

It must be noted that the unethical behavior on the part of St. Louis Cardinals Legal Team does not reflect negatively on the St. Louis Cardinals Players, Managers or Coaches of which we hold in high regards.

By: ______________________
Mr. Doug Lewis.

RUTH ANN SKORICH
Notary Public - Notary Seal
STATE OF MISSOURI
St. Louis County
My Commission Expires: April 5, 2008

Jury Trial Requested

Per the **United States Constitution** Bill of Rights

Amendment VII

In suits at common law, where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved, and no fact tried by a jury, shall be otherwise reexamined in any court of the United States, than according to the rules of the common law.

cc.

St. Louis Chan 2 NEWS

CERTIFICATE OF MAILING AND SERVICE

I certify that on March 29, 2007 an original of Defendants Response is being deposited with the United States Postal Service as First Class Mail in an envelope to:

Nicholas B. Clifford, Jr
Armstrong Teasdale LLP
One Metropolitan Square,
Suite 2600
Florissant, MO 63034
314-621-5070
Fax: 314 621-5065
Email: nclifford@armstrongteasdale.com

Dated: March 29, 2007 By: ______________________
Mr. Doug J. Lewis.

From: Mr. Douglas Lewis
4143 Fox Crossings
St. Louis, Mo 63034
314 341-8567

To: Secretary of States Office
Trademark Division, Dept of Business
3rd Floor Howlett Building
Springfield, Illinois 62756
217 524-0400

Date: March 28, 2007

Re: **Cancellation of below listed marks based on "Coercion"** and **"Discrimination".**

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(1) Illinois Cardinals, Registration No. 89156
(2) East St. Louis Cardinals, Registration No. 89212

It must be noted that the unethical behavior on the part of St. Louis Cardinals Legal Team does not reflect negatively on the St. Louis Cardinals Players, Managers or Coaches of which we hold in high regards.

By: [signature]
Mr. Doug Lewis

RUTH ANN SKORICH
Notary Public - Notary Seal
STATE OF MISSOURI
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